

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MARK WALTERS )  
Plaintiff, )  
v. ) Civil Action No. 1:23-cv-03122-  
OpenAI, L.L.C., ) MLB  
Defendant. )  
)

**JOINT MOTION FOR AN EXTENSION OF TIME TO SUBMIT THE  
JOINT PRELIMINARY REPORT AND DISCOVERY PLAN**

Defendant OpenAI, L.L.C., (“Defendant”) and Plaintiff Mark Walters, by and through its undersigned counsel, jointly move this Court for an extension of time to submit the Joint Preliminary Report and Discovery Plan up to and including August 28, 2023. The current deadline is August 14, 2023, and Plaintiff’s counsel has previously requested a leave of absence for a three-week period during this time.

Dated: August 7, 2023

By: /s/ John R. Monroe  
John R. Monroe  
John R. Monroe Law, P.C.  
156 Robert Jones Road  
Dawsonville, GA 30534  
678-362-7650  
jrm@johnmonroelaw.com  
Attorney for Plaintiff

Respectfully submitted,

By: /s/ Brendan Krasinski  
Brendan Krasinski  
Georgia Bar No. 159089  
DLA Piper LLP (US)  
1201 West Peachtree Street, Suite  
2900  
Atlanta, Georgia 30309  
Tel.: (404) 736-7861  
Fax: (404) 682-7831

brendan.krasinski@dlapiper.com

Danny Tobey, *pro hac vice*  
1900 N. Pearl St., Suite 2200  
Dallas, TX 75201  
Tel.: (214) 743-4500  
Fax: (214) 743-4545  
danny.tobey@dlapiper.com

Ashley Allen Carr, *pro hac vice*  
303 Colorado Street, Suite 3000  
Austin, TX 78701  
Tel.: (512) 457-7000  
Fax: (512) 457-7001  
ashley.carr@dlapiper.com

Ilana H. Eisenstein, *pro hac vice*  
Marie Bussey-Garza, *pro hac vice*  
One Liberty Place  
1650 Market Street, Suite 5000  
Philadelphia, PA 19103  
Tel.: (215) 656-3300  
Fax: (215) 656-3301  
ilana.eisenstein@us.dlapiper.com  
marie.bussey-  
garza@us.dlapiper.com

Peter Karanjia, *pro hac*  
500 Eighth Street, NW  
Washington, DC 20004  
Tel.: (202) 799-4000  
Fax: (202) 799-5000  
peter.karanjia@dlapiper.com

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 7<sup>th</sup> day of August 2023, I electronically filed the foregoing JOINT MOTION FOR EXTENSION TO SUBMIT THE JOINT PRELIMINARY REPORT AND DISCOVERY PLAN with the Clerk of Court using the CM/ECF system, which will send e-mail notification of such filing to all attorneys of record.

Dated: August 7, 2023

By: /s/ Brendan Krasinski

Brendan Krasinski